

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., EVE NEVADA, LLC, HUNTER KILLER PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., GUNFIGHTER PRODUCTIONS, LLC, VOLTAGE HOLDINGS, LLC, MILLENNIUM IP, INC., KILLING LINK DISTRIBUTION, LLC, LHF PRODUCTIONS, INC., RAMBO V PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., WONDER ONE, LLC, and 42 VENTURES, LLC,

Plaintiffs,

vs.

WICKED TECHNOLOGY LIMITED d/b/a VPN.HT, VPN.HT LIMITED, MOHAMED AMINE FAOUANI, JOHN OR JANE DOE d/b/a POPCORNTIME.APP, and DOES 1-100,

Defendants.

Civil Action No. 1:21-cv-00282-RDA-TCB

MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT

COMES NOW Defendants WICKED TECHNOLOGY LIMITED d/b/a VPN.HT, VPN.HT LIMITED, and MOHAMED AMINE FAOUANI, by counsel and by special appearance for the limited purpose of challenging personal jurisdiction pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, and respectfully file this Motion to Dismiss Plaintiffs' First Amended Complaint for lack of personal jurisdiction.

The grounds for this motion are set forth more fully in the attached memorandum incorporated by reference herein.

Date: May 6, 2021

Respectfully Submitted,

WICKED TECHNOLOGY LIMITED d/b/a
VPN.HT, VPN.HT LIMITED, and
MOHAMED AMINE FAOUANI

/Benjamin E. Maskell/

Benjamin E. Maskell, Esquire
Va. State Bar No. 78791
MASKELL LAW PLLC
937 N. Daniel St.
Arlington, VA 22201
Telephone: (703) 568-4523
Email: Ben@MaskellLaw.com
*Counsel for Defendants Wicked Technology
Limited, VPN.HT Limited, and Mohamed
Amine Faouani*

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2021, a true copy of the foregoing Motion to Dismiss Plaintiffs' First Amended Complaint was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

Kerry S. Culpepper
CULPEPPER IP, LLLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
kculpepper@culpepperip.com
Counsel for Plaintiffs

Timothy B. Hyland
HYLAND LAW PLLC
1818 Library Street, Suite 500
thyland@hylandpllc.com
Counsel for Plaintiffs

/Benjamin E. Maskell/

Benjamin E. Maskell, Esquire
Va. State Bar No. 78791
MASKELL LAW PLLC
937 N. Daniel St.
Arlington, VA 22201
Telephone: (703) 568-4523
Email: Ben@MaskellLaw.com
Counsel for Defendants Wicked Technology Limited, VPN.HT Limited, and Mohamed Amine Faouani